To:Joint Steering Committee for Development of RDAFrom:Christine Frodl, DNB representativeSubject:Proposed Revision of RDA 16.2.2 (Preferred Name for the Place)

DNB thanks ALA for preparing this proposal. DNB agrees with this proposal with some further revisions:

The terms "federation" and "first-level administrative division" have to be defined clearly in the context of the RDA instructions. In general the proposals' perspective is Anglo-American-centric; more general instructions would lead towards the desired goal of internationalization of RDA (see RDA 0.11.1). Therefore we would welcome, if ALA would continue to work on these issues.

The German-speaking community also would like to apply and therefore to suggest an alternative rule: The names of larger places should not be recorded as part of the name, but should be recorded in separate data elements. Doing this, we, and surely also other national agencies and library networks would not need to change their entries from "Budapest" into "Budapest (Ungarn)". The country codes could be recorded according to ISO 3166. If needed, the form "Budapest (Ungarn)" could be generated automatically for display purposes or data exchange. Furthermore this method is language independent, because "XA-HU" stands for Hungary and could be displayed as "Hungary" in an English-speaking environment and as "Ungarn" in a German-speaking context. We recommend strongly considering this approach, which is also relevant for future bibliographic applications.